

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

PHI THETA KAPPA HONOR SOCIETY,)	
)	
Plaintiff/Counter-Defendant)	Civil Action No. 3:22-cv-00208-CWR-RPM
)	
v.)	
)	
HONORSOCIETY.ORG, INC.,)	
)	
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
HONOR SOCIETY FOUNDATION, INC.,)	
)	
Defendant)	
)	
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)	
HONORSOCIETY.ORG, INC.,)	
)	
Defendant/Counter-Plaintiff)	
/Third-Party-Plaintiff)	
)	
v.)	
)	
DR. LYNN TINCHER-LADNER,)	
)	
Third-Party Defendant)	

Declaration of Dr. Lynn Tincher-Ladner

I, Lynn Tincher-Ladner, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am the President and CEO of Phi Theta Kappa Honor Society (“PTK”).
2. Since the onset of Honorsociety.org, Inc.’s (“Honor Society”) malicious campaign against PTK in March 2024, PTK has already felt the effects.

3. I have already testified at length to PTK's ongoing damages, including through multiple Declarations submitted in support of PTK's Motions for Preliminary Injunction and in person before the Court during the July 12 Preliminary Injunction Hearing.

4. Due to Honor Society's conduct, PTK is experiencing unprecedented member attrition (i.e., members contacting PTK to request cancellation of their lifetime membership) and decline in membership acceptance.

5. In August 2024, PTK's membership acceptance rate was down over 41% on a year over year basis. *See* Ex. 1. This is particularly alarming I understand community college enrollment to be up, and PTK issued more invitations in its summer campaign than it did in 2023. I attribute this decline not only to Honor Society's malicious survey entitled "Community College Honor Societies Survey" ("CCHS Survey") that this Court has already partly enjoined but also Honor Society's online campaign to paint PTK (and myself) as villains.

6. I understand that Honor Society has produced a number of responses it has received in response to the enjoined questions from the CCHS Survey; however, because these responses are marked HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY, I have been unable to personally review them.

7. PTK's counsel provided me a list of only student names and email addresses to compare with the present PTK membership/invitation list. My understanding is that at least two individuals on this list unsubscribed directly after responding to the CCHS Survey that, at the time, included the now enjoined questions.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 6, 2024.

A handwritten signature in black ink, appearing to read "Lynn Tincher-Ladner", written over a horizontal line.

Lynn Tincher-Ladner, Ph.D.

EXHIBIT 1 to EXHIBIT B

	To Date	To Date	*GoalTD	Month Goal	Goal Difference	
	Aug 2023	Aug 2024	Forecast	Forecast	To Date	Month
Division I						
July	820	676	1,222	1,222	-546	-546
August	1,703	784	1,222	1,222	-438	-438
Division I: Q3	2,523	1,460	2,082	4,428	-622	-2,968
Division I: YTD	21,591	19,634	23,588	32,752	-3,954	-3,954
Division II						
July	1,116	975	1,166	1,166	-191	-191
August	2,086	1,185	1,166	1,166	19	19
Division II: Q3	3,202	2,160	2,642	5,424	-482	-3,264
Division II: YTD	21,560	20,941	23,554	31,245	-2,613	-2,613
Division III						
July	576	580	853	853	-273	-273
August	1,370	1,022	853	853	169	169
Division III: Q3	1,946	1,602	1,606	3,562	-4	-1,960
Division III: YTD	15,458	15,174	16,888	22,860	-1,714	-1,714
Division IV						
July	363	531	905	905	-374	-374
August	1,133	706	905	905	-199	-199
Division IV: Q3	1,496	1,237	1,234	2,946	3	-1,709
Division IV: YTD	16,258	16,414	17,762	24,258	-1,348	-1,348
No Division						
July	2	2	3	3	-1	-1
August	2	2	3	3	-1	-1
No Division: Q3	4	4	3	5	1	-1
No Division: YTD	16	21	17	88	4	4
Total MTD	6,294	3,699	3,763	4,149	-64	-450
Total YTD	74,883	72,186	121,000	121,000	-48,814	-48,814
Percent Change	M:	-41.2%	-1.7%	-10.8%		
Compared to 2024	Y:	-3.6%	-40.3%	-40.3%		

*Forecasted YTD and MTD totals are estimated using the forecasted monthly goal and the average percentage of joins MTD and YTD.

